

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 24-CR-00198-SRB

v.

DELEON REED,

Defendant.

**MOTION FOR AN EXTENSION OF TIME
TO FILE PRETRIAL MOTIONS**

COMES NOW defendant Deleon Reed, by and through counsel, Laura O'Sullivan, and respectfully requests this Court for an extension of time to file pretrial motions. In support of this motion, Reed offers the following in support:

1. On September 10, 2024, an Indictment was filed charging Mr. Reed. Mr. Reed is charged with one count of felon in possession of a firearm, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8), and one count of possession of a machinegun in violation of 18 U.S.C. §§ 922(o) and 924(a)(2). (Doc. 1).
2. Mr. Reed was already detained as a result of supervised release violation allegations in 18-CR-00038. Mr. Reed remains in custody in both matters.
3. The Court appointed undersigned counsel in this matter on September 11, 2024. (Doc. 3)
4. On September 18, 2024, Mr. Reed appeared before United States Magistrate Judge Lajuana M. Counts for his arraignment and detention hearing. The Court granted the government's motion for pretrial detention finding Mr.

Reed ineligible for release on bail. Mr. Reed was remanded to the custody of the U.S. Marshal. The case was originally set to commence on the joint criminal jury trial docket of October 21, 2024. Undersigned counsel orally requested a continuance, and the Court set this matter on the joint criminal jury trial docket commencing January 6, 2025. (Doc. 5).

5. On November 21, 2024, counsel moved to continue the trial setting. (Doc. 10). On November 26, 2024, the Court granted the motion to continue and set this matter on the joint criminal jury trial docket commencing June 2, 2025. (Doc. 12, p. 1).
6. Reed, and undersigned counsel require additional time to review the discovery, adequately investigate and determine whether any pretrial motions are appropriate in this matter. This cannot reasonably be done by February 24, 2025.
7. Counsel reached out to Ashleigh Ragner, Assistant United States Attorney. As of the time of this filing, counsel had not received a response to our request for the government's position on this motion.
8. This extension is not sought for the purpose of dilatory delay but is sought in truth and fact that Reed may be afforded due process of law under the Fifth Amendment to the United States Constitution and afforded effective assistance of counsel under the Sixth Amendment to the United States Constitution.

WHEREFORE, Reed respectfully requests this Court to extend the

deadline for pretrial motions to March 24, 2025, and for whatever other relief this Court deems just and proper.

Respectfully Submitted,

SANDAGE LAW LLC

/s/ Laura O'Sullivan
Laura O'Sullivan, MO 41318
1600 Genesee Street, Suite 655
Kansas City, MO 64102
p 816.753.0800
f 816.735.4602
e laura@sandagelaw.com
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

On February 24, 2025, I served this document by depositing an electronic copy of it in the Court's electronic filing system, which shall distribute notice to all attorneys of record.

/s/ Laura O'Sullivan
Laura O'Sullivan